

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IFC CREDIT CORPORATION, an	§	
Illinois corporation,	§	
	§	
Plaintiff,	§	Case No. 08 CV 3822
	§	
v.	§	Judge: Manning
	§	
JOHNSON BROADCASTING, INC., a	§	Magistrate Judge: Cole
Michigan corporation, JOHNSON	§	
BROADCASTING OF DALLAS, INC., a	§	
Texas corporation, DOUGLAS R.	§	
JOHNSON, individually, and MELANIE	§	
JOHNSON, individually,	§	
	§	
Defendants.	§	

**AGREED MOTION FOR ENLARGEMENT OF TIME TO RESPOND
TO PLAINTIFF'S VERIFIED COMPLAINT**

Defendants Johnson Broadcasting, Inc., Johnson Broadcasting of Dallas, Inc., and Douglas R. Johnson, by and through their undersigned counsel, and pursuant to Federal Rule of Civil Procedure 6(b), hereby move the Court for an enlargement of time up to and including September 22, 2008 for Defendants to file an answer, motion, or other responsive pleading in response to the Plaintiff's Verified Complaint.

Plaintiff contends that Johnson Broadcasting, Inc. was served on July 15, 2008. Johnson Broadcasting, Inc. contends that the service is insufficient. In order to resolve the issue, the parties have agreed that the time to move, respond or answer for Johnson Broadcasting, Inc., Johnson Broadcasting of Dallas, Inc. and Douglas R. Johnson is September 22, 2008.

WHEREFORE, Movants request that the Court order that the time to move, respond or answer for Defendants Johnson Broadcasting, Inc., Johnson Broadcasting of Dallas, Inc., and Douglas R. Johnson is September 22, 2008.

Dated: August 26, 2008

ANDREWS KURTH LLP

By: /s/ Joe C. Holzer
Joe C. Holzer
Federal Bar ID No. 09933800
600 Travis, Suite 4200
Houston, Texas 77002
Telephone: 713-220-4172
Facsimile: 713-238-7278
Email: jholzer@akllp.com

*Attorneys for Defendants Johnson Broadcasting, Inc.,
Johnson Broadcasting of Dallas, Inc., and Douglas R.
Johnson*

CERTIFICATE OF COUNSEL

I have conferred with opposing counsel by email on August 25, 2008, and this Motion is agreed.

/s/ Joe C. Holzer

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Agreed Motion for Enlargement of Time to Respond to Plaintiff's Verified Complaint was served on the following counsel of record on August 26, 2008 by United States mail, postage prepaid, and by facsimile to 847-663-6741, on or before the hour of 5:00 pm:

Beth Anne Alcantar
Senior Litigation Associate Attorney
IFC Credit Corporation
8700 Waukegan Road, Suite 100
Morton Grove, Illinois 60053
Attorney for Plaintiff

/s/ Joe C. Holzer